



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

WMP/AES  
F. #2014R00501

271 Cadman Plaza East  
Brooklyn, New York 11201

January 15, 2016

By ECF and Hand Delivery

Marcus A. Asner, Esq.  
Arnold & Porter LLP  
399 Park Avenue  
New York, NY 10022-4690

Jonathan S. Sack, Esq.  
Morvillo, Abramowitz, Grand, Iason & Silberberg P.C.  
565 Fifth Avenue  
New York, NY 10017

Re: United States v. Martin Shkreli, et al.  
Criminal Docket No. 15-637 (KAM)

Dear Messrs. Asner and Sack:

In accordance with Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter. This disclosure supplements the government's earlier disclosure under cover of letter dated December 22, 2015. The government again requests reciprocal discovery from the defendants.

Enclosed please find a thumb drive that contains copies of the following materials:

Description	Bates Range
Records received from Retrophin, Inc.	R000001 to R023545
Records received from Deutsche Bank concerning an account related to Martin Shkreli	Deutsche-000001 to Deutsche-000011
Records received from E*Trade concerning six accounts related to defendant Martin Shkreli	ETRADE-000001 to ETRADE-0011270
Records received from Laidlaw & Company concerning an account related to defendant Martin Shkreli	Laidlaw-000001 to Laidlaw-000053

Description	Bates Range
Records received from Merrill Lynch concerning accounts related to defendant Martin Shkreli	MerLyn-000001 to MerLyn-000171
Records received from Stern Agee concerning an account related to defendant Martin Shkreli	Agee-000001 to Agee-000025
Records received from JP Morgan Chase concerning accounts related to defendant Martin Shkreli, Retrophin LLC, and Retrophin, Inc.	JPMC-000001 to JPMC-001041
Records received from Citrin Cooperman concerning Retrophin, Inc.	CITRON000001 to CITRON313896
Records received from Marcum LLP concerning Retrophin, Inc.	Marcum Retrophin EDNY_00000001 to Marcum Retrophin EDNY_00016195
Records received from Standard Registrar concerning Retrophin, Inc.	Standard-000001 to Standard-000421
Records received from T-Mobile concerning a telephone number ending in 2783	TMobile-000001 to TMobile-000312
Records received from Twitter concerning accounts named "Legitbiotech" and "Thug_BioAnalyst"	Twitter-000001 to Twitter-000005
Records received from NAV Consulting concerning various MSMB entities	NAV0000001 to NAV0065589

In addition, enclosed please copies of the following materials received by the United States Attorney's Office from the Securities and Exchange Commission ("SEC"):

Description	Bates Range
Records received by the SEC from Bank of America concerning an account related to MSMB Healthcare	SEC-BOA-P-0000001 to SEC-BOA-P-0000094; SEC-BOA-E-0000001
Records received by the SEC from the Financial Industry Regulatory Authority ("FINRA") concerning a FINRA action brought by Merrill Lynch against defendant Martin Shkreli, Marek Biestek, and MSMB Capital (the "Merrill Lynch FINRA action")	SEC-FINRA-E-0000001 to SEC-FINRA-E-0000651
Records received by the SEC from Interactive Brokers Group concerning MSMB Capital	SEC-IB-E-0000001 to SEC-IB-E-0009952

Description	Bates Range
Records received by the SEC from Jefferies concerning Desert Gateway and Retrophin, Inc.	JEFF-SEC000001 to JEFF-SEC000202
Records received by the SEC from JP Morgan Chase, including records concerning accounts related to the MSMB entities	SEC-JPMC-P-0000001 to SEC-JPMC-P-0000212
Records received by the SEC concerning an account related to MSMB Capital	SEC-KCA-E-0000001 to SEC-KCA-E-0000008
Records received by the SEC from Merrill Lynch concerning the Merrill Lynch FINRA action	ML_SEC_00000001 to ML_SEC_00006610
Records received by the SEC from MSMB Capital Management	MSMB000001 to MSMB014033; SEC-MSMB-E-000001 to SEC-MSMB-E-000065
Records received by the SEC from National Financial Services, including records concerning accounts related to defendant Martin Shkreli and Retrophin, Inc.	SEC-NFS-E-0000001 to SEC-NFS-E-0000256
Records concerning Retrophin, Inc. v. Timothy Pierotti	SEC-NY8799-P-0000001 to SEC-NY8799-P-0000026
Records received by the SEC from an MSMB Capital investor	SEC-NY8799-E-0000153 to SEC-NY8799-E-0000168
Records received by the SEC from Rothstein Kass related to MSMB Consumer LP	SEC-RK-E-0000001 to SEC-RK-E-0000548
Records received by the SEC from Scottrade concerning an account related to defendant Martin Shkreli	SEC-Scottrade-P-0000001 to SEC-Scottrade-P-0000004; SEC-SCOTTRADE-E-0000001 to SEC-SCOTTRADE-E-0000044
Records received by the SEC from Standard Registrar	SEC-SRT-E-0000001 to SEC-SRT-E-0000022
Records received by the SEC from Retrophin, Inc.	RTRX000000563 to RTRX000004483

Please also note that the thumb drive is encrypted, and that the password for the drive will be provided via email. If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

ROBERT L. CAPERS  
United States Attorney

By: /s/ Alixandra Smith  
Winston Paes  
Alixandra Smith  
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Enclosure

cc: Clerk of the Court (KAM) (by ECF) (w/o enclosures)